## UNITED STATES BANKRUPTCY COURT EASTERN DISTRICT OF PENNSYLVANIA

IN RE: Jorge Colon

CASE NO.: 18-12337-mdc

Debtor

CHAPTER 13

SN Servicing Corporation, as servicer for U.S. Bank Trust National

Association, as Trustee of the **Bungalow Series IV Trust** 

Movant

v.

Jorge Colon

William C. Miller - Trustee

Respondents

JUDGE: Magdeline D. Coleman

## **CERTIFICATION OF DEFAULT**

FRIEDMAN VARTOLO, LLP, attorneys for Movant, hereby certifies that the above-captioned Debtor has failed to comply with the terms of the Stipulation approved by the U.S. Bankruptcy Judge Magdeline D. Coleman on February 24, 2020. A copy of the Stipulation is attached hereto as Exhibit "A". Movant certifies that the required Notice of Default required by the Order was sent to Debtor and Debtor's attorney on December 4, 2020 and Debtor has failed to cure the default. A copy of the Notice of Default is attached hereto as Exhibit "B". In accordance with the terms of said Stipulation agreed to by the parties, the Automatic Stay is hereby lifted as to permit Movant to proceed with their State Court remedies upon Debtor's property.

Dated: January 5, 2021

By: /s/Lorraine Gazzara Doyle

Lorraine Gazzara Doyle, Esq. FRIEDMAN VARTOLO LLP Attorneys for Movant 1325 Franklin Avenue, Suite 230 Garden City, New York 11530 T: (212) 471-5100 F: (212) 471-5150

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